

III. REMARKS

Claims 1-31 are pending in this application. By this amendment, claim 1 has been amended. These amendments are being made to facilitate early allowance of the presently claimed subject matter. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

Entry of this Amendment is proper under 37 C.F.R. 1.116(b) because the Amendment: (a) places the application in condition for allowance as discussed below; (b) does not raise any new issues requiring further search and/or consideration; and (c) places the application in better form for appeal. Accordingly, Applicants respectfully request entry of this Amendment.

In the Office Action, claims 1 and 7 are objected to for informalities. Claims 1-31 are rejected under 35 U.S.C. §102(e) as allegedly being unpatentable over Gorelik (U.S. Patent Pub. No.2005/0055369), hereafter “Gorelik.”

A. OBJECTION TO CLAIM 1 FOR INFORMALITIES

The Office has asserted that claims 1 and 7 contain informalities. Specifically, the Office states that it is unclear from the language of the claims whether there is one or several matching resources. Applicants have amended claim 1 to recite “...a matching resource that is external.” Thus, as claimed, the invention may have a number of matching resources (e.g., for each of the

matching processes), one of which must be external. Applicants assert that this amendment further clarifies the invention. Accordingly, Applicants request that the rejection be withdrawn.

B. REJECTION OF CLAIMS 1-31 UNDER 35 U.S.C. §102(e)

With regard to the 35 U.S.C. §102(e) rejection over Gorelik, Applicants respectfully submit that the Office does not prove that Gorelik teaches each and every feature of the claimed invention. The Office cites various portions of the Gorelik publication, having a filing date of September 9, 2004, in support of its arguments to the contrary. However, the filing date of Applicants' invention is November 12, 2003, and, as such, pre-dates the filing date of the Gorelik utility application. Applicants recognize that Gorelik claims priority to Provisional Application No. 60/502,043, filed on September 10, 2003; however, the Office has not indicated whether the provisional application on which Gorelik is based (Gorelik provisional) includes support for the subject matter used in the Office's rejections. In any event, Applicants respectfully request a copy of the Gorelik provisional to review the Office's position. To this extent, Applicants reserve the right to present arguments against the Office's determination until the provisional application is made available for review.

Further, with respect to independent claims 1, 9, 16 and 24, Applicants submits that the cited references fail to teach or suggest a mining model schema. The passages of Gorelik cited by the Office teaches uses the word schema to describe the organization of its data before it is organized, but does not teach that the data is a mining model schema, i.e., acquired using a data mining application. Para. 0031. Rather, the data of Gorelik is described as "...data in disparate software applications, databases, files, reports, messages or systems," and not as being acquired

via data mining. In contrast, the claimed invention includes "...matching columns of the user data schema to corresponding columns of the mining model schema." As such, the schema of the claimed invention is not merely generic data in diverse software vehicles as are the schema of Gorelik, but is rather a mining model schema, i.e., obtained through data mining. Accordingly, the Gorelik does not teach the mining model schema of the claimed invention. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

With further respect to independent claims 1, 9, 16 and 24, Applicants respectfully submit that Gorelik also fails to teach matching by performing a number of matching processes in sequence until a match is found. The Office cites a flow chart element in figure 6 that states "Find the best match for each target location" and a passage of Gorelik that recites

Because we use statistics and attempt to find the best rather than absolute match, we can work with dirty or incomplete information and do not have to identify all possible binding conditions. Para 0055.

To this extent, Gorelick teaches using a single method, i.e., statistics, to find the best match between fields in different data sources and does not use more than one matching process in sequence until a match is found. The claimed invention, in contrast, includes "...matching... by performing a number of matching processes in sequence until a match is found." Claim 1. As such, in contrast to Gorelick, in which only a single method is used to find the best match, in the claimed invention matching is done by performing a number of matching processes in sequence until a match is found. Furthermore, at least one of these matching processes does not utilize an external matching resource. Accordingly, Applicants request that the rejection be withdrawn.

With respect to dependent claims, Applicants herein incorporate the arguments presented above with respect to the independent claims from which the claims depend. Furthermore,

Applicants submit that all dependant claims are allowable based on their own distinct features. Since the cited art does not teach each and every feature of the claimed invention, Applicants respectfully request withdrawal of this rejection.

IV. CONCLUSION

In addition to the above arguments, Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. Additionally, Applicants do not acquiesce to the Office's combinations and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However, Applicants reserve the right to present such arguments in a later response should one be necessary.

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,



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Reg. No.: 54,593

Date: December 18, 2006

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